

**IN THE UNITED STATE DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

	)	
	)	
<b>GIGI'S CUPCAKES, LLC</b>	)	<b>Civil Action No. 3:17-cv-03009</b>
	)	Consolidated with:
<b>Plaintiff,</b>	)	3:17-cv-3010-B
	)	3:17-cv-3011-B
<b>v.</b>	)	3:17-cv-3012-B
	)	3:17-cv-3013-B
	)	3:17-cv-3014-B
<b>4 BOX, LLC, NIKOLAS PAPPAS, AND</b>	)	3:17-cv-3015-B
<b>LORAIN PAPPAS</b>	)	3:17-cv-3016-B
	)	3:17-cv-3017-B
<b>Defendants.</b>	)	3:17-cv-3018-B
	)	

**MOTION FOR LEAVE TO ENTER AGREED PROTECTIVE ORDER**

Plaintiff Gigi's Cupcakes, jointly with Defendants 4 Box LLC, *et al*, hereby move for leave for entry of the attached Agreed Protective Order in order to facilitate motion practice. The parties anticipate the potential exchange of confidential, propriety and sensitive information. In order to protect the confidentiality of any information exchanged, the parties have agreed to the entry of the attached protective order. Further, good cause exists to protect any confidential, proprietary and sensitive information. For these reasons, and pursuant to this Court's Electronic order dated February 1, 2018, Plaintiff and Defendants respectfully request the court enter the Agreed Protective Order.

Dated: February 26, 2018

Respectfully submitted,

WINSTON & STRAWN LLP

COHEN, LLC

By: /s/ John C.C. Sanders, Jr.

By: /s/ Jeffrey Cohen

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 26, 2018, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ John C.C. Sanders, Jr.  
John C.C. Sanders, Jr.